IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

LAMPLIGHT LICENSING, LLC,	)	
Plaintiff,	)	
	)	**Civil Action No. 6:21-cv-01240**
v.	)	
	)	
SCHNEIDER ELECTRIC HOLDINGS, INC. and SCHNEIDER ELECTRIC USA, INC.	)	**JURY TRIAL DEMANDED**
Defendant.	)	

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Lamplight Licensing, LLC ("Lamplight") files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,716,393 ("the '393 patent") (referred to as the "Patent-in-Suit") by Schneider Electric Holdings, Inc. and Schneider Electric USA, Inc. (collectively referred to as "Schneider").

I. THE PARTIES

1. Plaintiff Lamplight is a Texas Limited Liability Company with its principal place of business located at 3571 Far West Blvd #3144, Austin, TX 78731.

2. On information and belief, Schneider is a corporation organized and existing under the laws of the state of Delaware, with a place of business located at 6515 Sanger Ave., Waco, Texas 76710. On information and belief, Schneider sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in Texas and this judicial district. Schneider Electric USA, Inc. can be served with process at its registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701 or anywhere else it may be found.

II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has (1) "a physical place in the district;" (2) that is "regular and established;" and (3) is a "the place of the defendant." Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Texas and this District.

III. INFRINGEMENT

A. Infringement of the '393 Patent

6. On July 25, 2017, U.S. Patent No. 9,716,393 ("the '393 patent", included as an attachment and part of this Complaint) entitled "Battery Backup Remaining Time Arrangement" was duly and legally issued by the U.S. Patent and Trademark Office. Lamplight owns the '393 patent by assignment.

7. The '393 patent provide an apparatus and associated systems and methods for reducing current consumption from a battery.

8. Schneider designs, manufactures, markets and sells battery devices including, but not limited to, the Schneider Electric Smart-UPS w/ APC SmartConnect and PowerChute Network Shutdown, that infringe one or more claims of the '393 patent, including one or more of claims 1-12, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '393 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant's procurement of monetary and commercial benefit from it.

9. Support for the allegations of infringement may be found in the following preliminary table:

Claims	Accused Product: Schneider Electric Smart-UPS w/ APC SmartConnect and PowerChute Network Shutdown
1. An apparatus for generating a signal indicative of a battery remaining time, comprising:	The accused product provides an apparatus for generating a signal indicative of a battery remaining time (e.g., battery remaining time is generated and displayed on the LCD display of the accused device. In addition, the battery remaining time is transmitted for display by the web portal).

LCD display screen

Clear, consistent, and detailed information in your choice of basic or advanced menus

Logs

See explanation of last 10 transfers and faults

Power status

Operating mode, efficiency, load, input / output frequency, battery capacity, runtime and more

Quick status indicators

Online, on battery, fault, and replace battery LEDs for quick status identification

Smart-UPS™ with APC™ SmartConnect

Maintain business certainty with intelligent network power protection

The world's most popular network and server UPS

APC™ award-winning Smart-UPS™ is the most popular UPS in the world for servers, storage and network power protection. Smart-UPS provides availability and manageability to your network allowing you to focus on business growth instead of business downtime. Trusted to protect critical data and equipment from power problems by supplying clean and reliable network-grade power.

Smart-UPS' patented green mode provides extremely high efficiency at low, medium and high load levels making them ideal for multi-core or virtualized servers that have varying load consumption all while saving utility costs. Managed outlet groups allow segmented load control to power on or off your equipment in series as well as load shedding to preserve battery power for critical connected equipment or reboot a hung device without impacting other equipment.

PowerChute Network Shutdown features:

- Graceful network-based shutdown
- Sequenced server shutdown
- Integration with Vmware and Microsoft Hyper-V
- Support for virtual clusters
- Virtual machine migration / shutdown
- IPv6 support
- Virtual machine prioritization
- Command file integration
- Redundant and parallel UPS support
- Event logging
- HTTPS communications
- Scalable architecture for host of client systems

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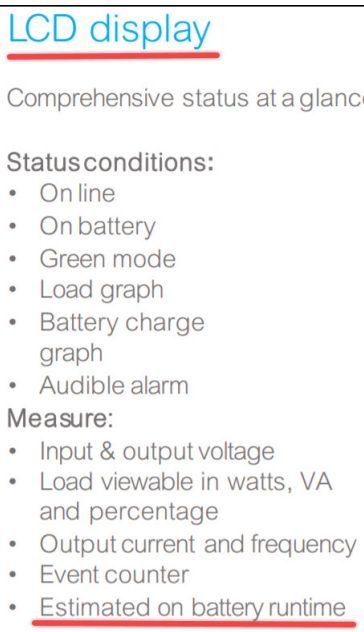
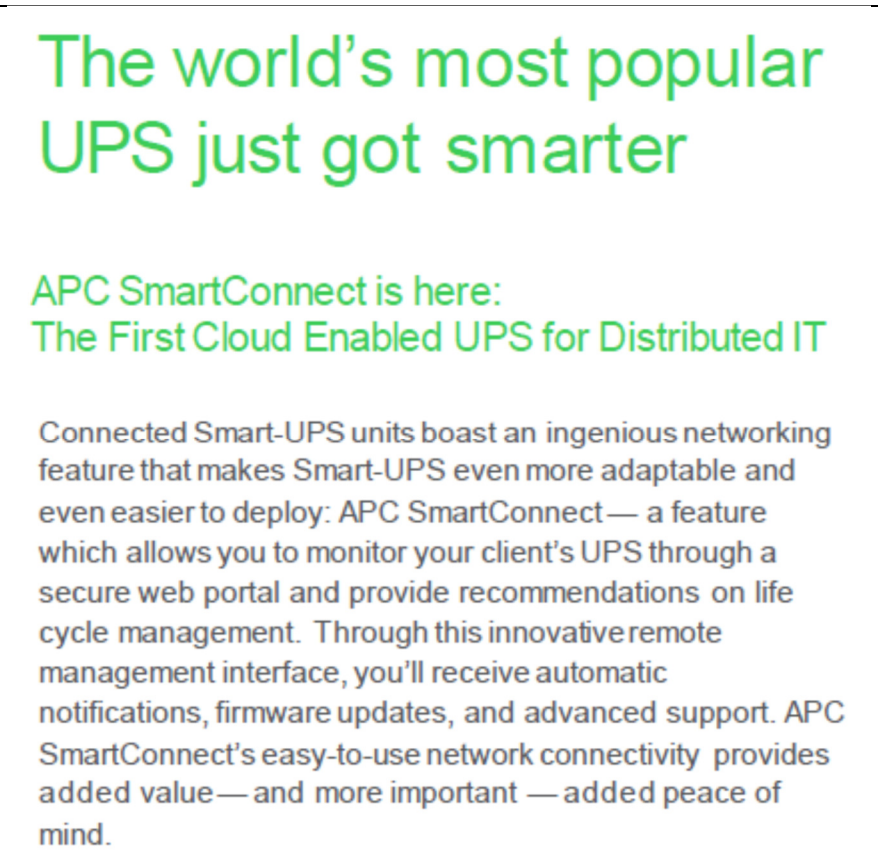
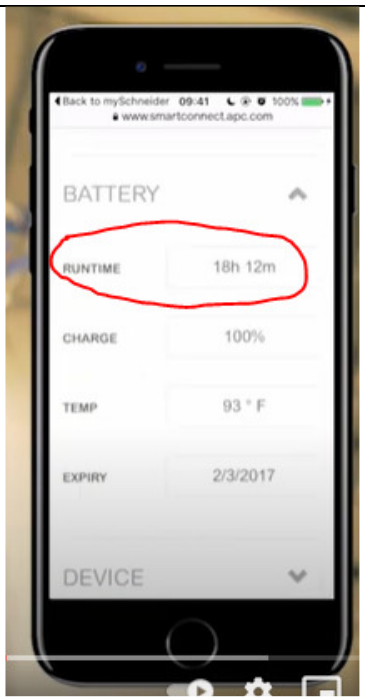
	 https://download.schneider-electric.com/files?p_File_Name=EcoStruxure+Ready+Smart-UPS+with+APC+SmartConnect+Brochure+Americas+V6.pdf&p_Doc_Ref=SPD_ABAR-AW6SSZ_EN&p_enDocType=Brochure

	 https://download.schneider-electric.com/files?p_enDocType=Presentation&p_File_Name=CENZ-AW6SFH_R0_EN_PPT_PDF.pdf&p_Doc_Ref=SPD_CENZ-AW6SFH_EN

	 Connected Smart-UPS: The First Cloud Enabled UPS For Distributed IT - YouTube at 1:12
a source of a mains supply voltage for energizing a first load circuit and a second load circuit, prior to an interruption in said mains supply voltage;	The accused product provides a source of a mains supply voltage (e.g., output voltage during online mode powered by AC input) for energizing a fist load circuit (e.g., a first circuit providing energy to non-critical loads/devices of a controlled outlet group) and a second load circuit (e.g., a second circuit providing energy to critical loads/devices of a main outlet group), prior to an interruption in said main supply voltage (e.g., the AC input fails) The accused product regulates mains supply voltage for their connected loads/devices and supplies battery power upon an interruption in the mains supply voltage. The connected devices can be configured into a controlled outlet group for non-critical devices energized by a fist load circuit and a main outlet group for critical devices energized by a second load circuit such

that devices in different groups are turned off sequentially when the AC input fails and the accused product is switched to battery mode.

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Quick Status Indicators

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https://download.schneider-electric.com/files?p_File_Name=EcoStruxure+Ready+Smart-UPS+with+APC+SmartConnect+Brochure+Americas+V6.pdf&p_Doc_Ref=SPD_ABAR-AW6SSZ_EN&p_enDocType=Brochure

Online Double Conversion

AC power is stable and clean upon generation. But during transmission and distribution, it is subject to voltage sags, spikes and complete failure that may interrupt computer operations, cause data loss and damage equipment. When it comes to safeguarding critical IT loads, only online double conversion technology protects fully against all these power problems, providing the highest levels of security for networks.

An online UPS system is usually called double conversion as well because incoming power is converted to direct current (DC) and then converted back to AC. This AC-DC/DC- AC design ensures an increased degree of isolation of the load from the irregularities on the main supply.

The online UPS takes the incoming AC power supply and converts it to DC using a a rectifier to feed the battery and the connected load via the inverter so that no power transfer switches are necessary. If the main AC input fails, the rectifier drops out of the circuit and the batteries keep the power flowing to the device connected to the UPS. When AC input power is restored, the rectifier resumes carrying most of the load and begins charging the batteries.

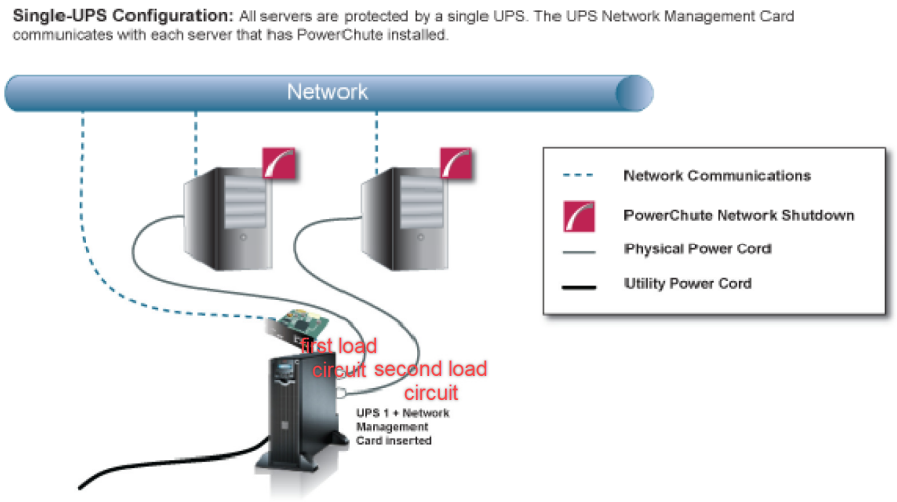
Because power runs through an online UPS continually, output is a perfect sine wave. This type of UPS protects the critical load from virtually all power disturbances, including subtle harmonics and waveform distortion.

This means the quality of power from online UPS is significantly better than that of other technologies. Offline and line-interactive technologies reduce the impact of spikes, surges and sags by either clipping the peaks and valleys, boosting power or switching to battery backup. Within the normal track of an electrical sine wave, however, most power fluctuations are left alone. Online UPS regenerates the sine wave, not just conditioning of the raw utility supply.

An online UPS delivers continuous, high-quality AC power to equipment with no break when transferring to battery, protecting equipment from virtually all power disturbances due to blackouts, brownouts, sags, surges or noise interference. A true online, double-conversion UPS provides 100% power conditioning, zero transfer time to battery, no change in output voltage and better transient suppression than line-interactive units.

Online double conversion is the most common UPS mode of operation used for protecting large data centers by providing the highest level of power quality to the load always. Online systems also provide frequency regulation, essential for use with backup generator systems to protect from variations common at generator start up.

https://www.Schneider.com/en-emea/about/news-and-insights/articles/educational-articles/what-are-the-different-types-of-ups-systems/



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Switched Outlet Group

Controlled separately from the UPS for discrete reboot of hung devices, sequenced ON/OFF, and non-critical load shedding

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Smart-UPS' patented green mode provides extremely high efficiency at low, medium and high load levels making them ideal for multi-core or virtualized servers that have varying load consumption all while saving utility costs. Managed outlet groups allow segmented load control to power on or off your equipment in series as well as load shedding to preserve battery power for critical connected equipment or reboot a hung device without impacting other equipment.

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Main Outlet Group and Controlled Outlet Group

Overview

The Main Outlet Group and the Controlled Outlet Group can be configured to independently turn off, turn on, shut down, and reboot connected equipment. (These features are not available on the 500 VA or 750 VA units.)

The Main and Controlled Outlet Groups can be configured to do the following:

- Turn off: Disconnect from power immediately and restart only with a manual command.
- Turn on: Connect to power immediately.
- Shutdown: Disconnect power in sequence, and automatically reapply power in sequence when utility power becomes available.
- Reboot: Shut down and restart.

In addition, the Main Outlet Group and the Controlled Outlet Group can be configured to do the following:

- Turn on or off in a specified sequence
- Automatically turn off or shut down when various conditions occur

Using the Main and Controlled Outlet Groups

The Main Outlet Group functions as a master switch. It will turn on first when power is applied, and shut down last when there is a power outage and battery runtime has been exhausted.

The Main Outlet Group must be turned on for the Controlled Outlet Group to turn on.

1. Connect critical equipment to the Main Outlet Group.
2. Connect peripheral equipment to the Controlled Outlet Group.
   - Nonessential equipment that should shut down quickly in the event of a power outage can be added to a short power off delay, to conserve battery runtime.
   - Equipment that has dependent peripherals that must restart or shut down in a specific order should be connected to a separate outlet group.
   - Equipment that needs to reboot independently from other equipment should be added to a separate outlet group.
3. Use the **Configuration** menus to set reaction of the Controlled Outlet Group in the event of a power outage.

Customize the Main and Controlled Outlet Groups

Use the **Configuration** menus to change the Main Outlet Group and the Controlled Outlet Group settings.

Function	Factory Default	Options	Description
Name String Outlet Group	Outlet Group 1	Edit these names using an external interface, such as the Network Management Card Web interface.	
UPS Name String	UPS Outlets		
Turn On Delay	0 sec	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn on and the actual startup.
Turn Off Delay	• 0 sec UPS Outlets • 90 sec Controlled Outlet Groups	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn off and the actual shut down.
Reboot Duration	8 sec	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group must remain off before it will restart.
Minimum Return Time	0 sec	Set the value in seconds	The amount of battery runtime that must be available before the UPS or a Controlled Outlet Group will turn on after a shutdown.
Load Shed On Battery	Disabled	• Enable • Disable	When the unit switches to battery power, the UPS will disconnect power to the Controlled Outlet Group to save battery runtime. Configure this delay time, use the LOAD SHED TIME WHEN ON BATTERY setting.
Load Shed Time when On Battery	1800 sec	Set the value in seconds	The amount of time the outlets will function on battery power before they will turn off.

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a battery for providing battery backup operation to energize said second load circuit after said interruption in said mains supply voltage is detected; and

The accused product provides a battery for providing battery backup operation to energize said second load circuit (e.g., circuit for providing energy to critical loads/devices of the main outlet group) after said interruption in said mains supply voltage is detected (e.g., when input AC power fails and the accused product is on battery mode)

Product Description

The APC™ by Schneider Electric Smart-UPS™ is a high performance uninterruptible power supply (UPS). The UPS provides protection for electronic equipment from utility power blackouts, brownouts, sags, and surges, small utility power fluctuations and large disturbances. The UPS also provides battery backup power for connected equipment until utility power returns to safe levels or the batteries are fully discharged.

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Smart-UPS™ with APC™ SmartConnect

Maintain business certainty with intelligent network power protection

The world's most popular network and server UPS

APC™ award-winning Smart-UPS™ is the most popular UPS in the world for servers, storage and network power protection. Smart-UPS provides availability and manageability to your network allowing you to focus on business growth instead of business downtime. Trusted to protect critical data and equipment from power problems by supplying clean and reliable network-grade power.

Smart-UPS' patented green mode provides extremely high efficiency at low, medium and high load levels making them ideal for multi-core or virtualized servers that have varying load consumption all while saving utility costs. Managed outlet groups allow segmented load control to power on or off your equipment in series as well as load shedding to preserve battery power for critical connected equipment or reboot a hung device without impacting other equipment.

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Battery type	Maintenance-free sealed lead-acid battery with suspended electrolyte; leak proof			
Replacement battery	RBC48	RBC6	RBC7	RBC55

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- Reboot: Shut down and restart.

In addition, the Main Outlet Group and the Controlled Outlet Group can be configured to do the following:

- Turn on or off in a specified sequence
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Using the Main and Controlled Outlet Groups

The Main Outlet Group functions as a master switch. It will turn on first when power is applied, and shut down last when there is a power outage and battery runtime has been exhausted.

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Reboot Duration	8 sec	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group must remain off before it will restart.
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<td>a processor coupled to said first load circuit and is configured to initiate a current drain reduction in said first load circuit after detection of said interruption, and</td>
<td>

The accused product provides a processor coupled to said first load circuit (e.g., circuit for providing energy to non-critical loads/devices of a controlled outlet group) and is configured to initiate a current drain reduction in said first load circuit after detection of said interruption (e.g., shut down or turn off the devices belonging to the controlled outlet group when the input AC power fails and the accused device is on battery mode)

Option 3: Perform a Manual Runtime Calibration. This is a manual procedure and should not be confused with the runtime calibration performed through PowerChute software. The batteries inside of the Smart-UPS are controlled by a microprocessor within the UPS. Sometimes it is necessary to reset this microprocessor, especially after the installation of new batteries.
Note: Before beginning the calibration make sure the UPS has been online and charging for at leat 24 hours for just the UPS or 48 hours for a UPS with external batteries.

1. Stop the PowerChute software from running and disconnect the serial cable.
2. There must be at least a 30% load attached to the UPS during this procedure, and this load cannot fluctuate more than +/- 5%. This process will cause the UPS to shut off and cut power to its power outlets, therefore, attach a non-critical load to the UPS and then force the UPS on battery by disconnecting it from utility power.
3. Allow the unit to run on battery until it turns off completely. Make sure a 30% load or greater is present!
4. Plug the UPS back into the wall outlet and allow it to recharge (it will recharge more quickly turned off and with no load present). Once the unit has recharged, the ""runtime remaining"" calculation should be more accurate. Remember that if the unit is an older model, then the runtime will not improve significantly.

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• Disable</td><td>When the unit switches to battery power, the UPS will disconnect power to the Controlled Outlet Group to save battery runtime.

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<td>to access a stored battery current magnitude value for use in calculating a battery remaining time indicative signal, such that, during a transitional shutdown delay interval of the apparatus that follows the detection of said interruption, said battery remaining time indicative signal is based on said stored battery current magnitude value that is</td>
<td>The accused product accesses a stored battery current magnitude value (e.g., battery current values obtained during calibration is stored for use of estimating battery remaining runtime during operation) for use in calculating a battery remaining time indicative signal (e.g., estimation of battery remaining runtime) such that, during a transitional shutdown delay interval of the apparatus that follows the detection of said interruption (e.g., during shut down or turn off of the non-critical loads/devices of the controlled outlet group on detection of the accused product being on battery mode), said battery remaining time indicative signal (e.g., estimation of battery remaining runtime) is based on said stored battery current magnitude value that is unaffected by real time variations and transient loading of said battery current magnitude during said transitional shutdown delay interval (e.g., during calibration, remaining runtime is calculated based on load, which corresponds to current magnitude value because the output voltage value is fixed. The relationship between remaining runtime and load (i.e., current value) is stored as a calibration curve which is applied later for runtime estimation during normal operation. The stored current value is unaffected</td>
</tr>
</table>

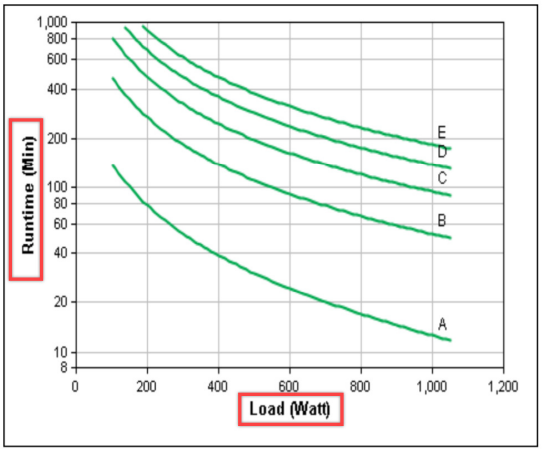
unaffected by real time variations and transient loading of said battery current magnitude during said transitional shutdown delay interval and is instead based on a current magnitude in a steady state of said battery backup operation.	by real time variations and transient loading of said battery current magnitude during transitional shutdown because it is previously measured during the calibration step) and is instead based on a current magnitude in a steady state of said battery backup operation (e.g., the stored load/current value for runtime estimation is based on a load/current magnitude in a steady state of said battery backup operation, i.e., the load/current must be without fluctuating during calibration which simulates a steady state battery backup operation) **Diagnostics** The Diagnostic screen displays the last diagnostic results, and enables you to initiate tests and calibrations. There are three types of diagnostics: • a **self test** performs internal UPS diagnostics **NOTE:** If the UPS is On Battery, a self test cannot be performed. Restore power to the UPS to run a self test. • an **alarm test** of your UPS (using a drop-down box in the Initiate Diagnostics section). • **a runtime calibration** causes the UPS to recalculate its available runtime capacity based on its present load. This ensures that the runtime reported is more accurate. Not all UPS models support runtime calibration. See **Notes on Runtime Calibration**. You can initiate an immediate self test, a calibration, or a UPS alarm test by selecting an option in the drop-down box under the **Initiate Diagnostics** section and clicking on Apply. **Notes on Runtime Calibration** • Runtime calibrations deeply discharge UPS batteries, which can leave a UPS temporarily unable to support its equipment if a power outage occurs. • You can perform a calibration only if battery capacity is at 100%. • The load on your UPS must be at least 10% without fluctuating to guarantee that a calibration will be accepted. This percentage varies based on UPS model, and will be higher if you have external batteries; the percentage value will vary depending on the number and the type. • To optimize the efficacy of the runtime calibration, it is recommended to perform the calibration using a connected device load that accurately represents the average load on the UPS. • Frequent calibrations reduce the life of batteries. Therefore, select runtime calibrations to occur only annually or semi-annually. Also perform a calibration whenever you significantly change the load that the UPS is supporting. https://download.schneider-electric.com/files?p_Doc_Ref=SPD_PMAR-9BULAD_EN

Battery Run-Times — APC Battery Solutions

Models with 120 V Output / 120 V Input

APC Smart-UPS RT 1500 VA Rack Tower 120 V, Battery Run-Times (minutes):

Curve	Part number(s)
A	SURTA1500RMXL2U
B	SURTA1500RMXL2U + (1)SURTA48RMXLBP2U
C	SURTA1500RMXL2U + (2)SURTA48RMXLBP2U
D	SURTA1500RMXL2U + (3)SURTA48RMXLBP2U
E	SURTA1500RMXL2U + (4)SURTA48RMXLBP2U



https://iportal2.schneider-electric.com/Contents/docs/UPS-SCON-8UHJUH_R1_EN.PDF

	 APC Smart-UPS SMT Tower Technical Specifications |	SMT750C	SMT1000C	SMT1500C	SMT2200C	SMT3000C | |---|---|---|---|---|---| | **Output** | | | | | | | Power Capacity | 500 W/750 VA | 700W / 1000VA | 1000W / 1500VA | 1980 W/2200 VA | 2700 W/3000 VA | | Nominal output voltage | 120 | | | | | | Output frequency | 47 - 53 Hz for 50 Hz nominal; 57 – 63 Hz for 60 Hz nominal | | | | | | Waveform type | Pure Sinewave | | | | | | Output connections (NEMA) | (6) 5-15R | (8) 5-15R | | (8) 5-15R, (2) 5-20R | | | Switched outlet groups | - | 1 | | | | | **Input** | | | | | | | Nominal input voltage | 120V | | | | | | Input voltage range for main operations (Max adjustable) | 82 – 144 (75 – 154V) | | | | | | Input frequency | 50/60 Hz +/-3 Hz (auto sensing) | | | | | | Input connection | 5-15P | | | 5-20P | L5-30P | | **Batteries and runtime** | | | | | | | Battery type | Maintenance-free sealed lead-acid battery with suspended electrolyte; leak proof | | | | | | Replacement battery | RBC48 | RBC6 | RBC7 | RBC55 | | | **Runtime estimates** | | | | | | | 200W | :22 | :45 | 1:24 | 2:17 | 2:29 | | 500W | :05 | :10 | :23 | :51 | :55 | | 700W | - | :06 | :12 | :34 | :37 | | 1000W | - | - | :07 | :21 | :23 | | 1400W | - | - | - | :13 | :14 | | 1600W | - | - | - | :10 | :12 | | Full load | :05 | :06 | :07 | :07 | :06 | https://download.schneider-electric.com/files?p_File_Name=EcoStruxure+Ready+Smart-UPS+with+APC+SmartConnect+Brochure+Americas+V6.pdf&p_Doc_Ref=SPD_ABAR-AW6SSZ_EN&p_enDocType=Brochure
2. An apparatus according to claim 1 wherein said processor initiates shutdown of said first load circuit when said interruption is detected.	The accused product wherein the processor initiates shutdown of said first load circuit (e.g., the devices of the controlled outlet group) when said interruption is detected (e.g., when the accused product switches to battery mode) **Option 3:** Perform a Manual Runtime Calibration. This is a manual procedure and should not be confused with the runtime calibration performed through PowerChute software. The batteries inside of the Smart-UPS are controlled by a microprocessor within the UPS. Sometimes it is necessary to reset this microprocessor, especially after the installation of new batteries. Note: Before beginning the calibration make sure the UPS has been online and charging for at leat 24 hours for just the UPS or 48 hours for a UPS with external batteries. 1. Stop the PowerChute software from running and disconnect the serial cable. 2. There must be at least a 30% load attached to the UPS during this procedure, and this load cannot fluctuate more than +/- 5%. This process will cause the UPS to shut off and cut power to its power outlets, therefore, attach a non-critical load to the UPS and then force the UPS on battery by disconnecting it from utility power. 3. Allow the unit to run on battery until it turns off completely. Make sure a 30% load or greater is present! 4. Plug the UPS back into the wall outlet and allow it to recharge (it will recharge more quickly turned off and with no load present). Once the unit has recharged, the ""runtime remaining"" calculation should be more accurate. Remember that if the unit is an older model, then the runtime will not improve significantly. https://www.apc.com/us/en/faqs/FA156538/

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Customize the Main and Controlled Outlet Groups

Use the **Configuration** menus to change the Main Outlet Group and the Controlled Outlet Group settings.

Function	Factory Default	Options	Description
Name String Outlet Group	Outlet Group 1	Edit these names using an external interface, such as the Network Management Card Web interface.	
UPS Name String	UPS Outlets		
Turn On Delay	0 sec	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn on and the actual startup.
Turn Off Delay	• 0 sec UPS Outlets • 90 sec Controlled Outlet Groups	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn off and the actual shut down.
Reboot Duration	8 sec	Set the value in seconds	The amount of time the UPS or a Controlled Outlet Group must remain off before it will restart.
Minimum Return Time	0 sec	Set the value in seconds	The amount of battery runtime that must be available before the UPS or a Controlled Outlet Group will turn on after a shutdown.
Load Shed On Battery	Disabled	• Enable • Disable	When the unit switches to battery power, the UPS will disconnect power to the Controlled Outlet Group to save battery runtime. Configure this delay time, use the LOAD SHED TIME WHEN ON BATTERY setting.
Load Shed Time when On Battery	1800 sec	Set the value in seconds	The amount of time the outlets will function on battery power before they will turn off.

https://cdn.cnetcontent.com/9a/fa/9afa6d3e-3373-4a78-a073-0f7d274ab6e4.pdf

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<tr><td>4. An apparatus according to claim 2 wherein first load circuit experiences a shutdown delay that delays current drain reduction, during said interval.</td><td>The accused product according to claim 2, wherein first load circuit (e.g., circuit for providing energy to the devices of the controlled outlet group) experiences a shutdown delay (e.g., load shed time when on battery) that</td></tr>
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<td>delays current drain reduction, during said interval

Customize the Main and Controlled Outlet Groups
Use the Configuration menus to change the Main Outlet Group and the Controlled Outlet Group settings.
<table><tr><th>Function</th><th>Factory Default</th><th>Options</th><th>Description</th></tr><tr><td>Name String Outlet Group</td><td>Outlet Group 1</td><td colspan="2" rowspan="2">Edit these names using an external interface, such as the Network Management Card Web interface.</td></tr><tr><td>UPS Name String</td><td>UPS Outlets</td></tr><tr><td>Turn On Delay</td><td>0 sec</td><td>Set the value in seconds</td><td>The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn on and the actual startup.</td></tr><tr><td>Turn Off Delay</td><td>• 0 sec UPS Outlets
• 90 sec Controlled Outlet Groups</td><td>Set the value in seconds</td><td>The amount of time the UPS or a Controlled Outlet Group will wait between receiving the command to turn off and the actual shut down.</td></tr><tr><td>Reboot Duration</td><td>8 sec</td><td>Set the value in seconds</td><td>The amount of time the UPS or a Controlled Outlet Group must remain off before it will restart.</td></tr><tr><td>Minimum Return Time</td><td>0 sec</td><td>Set the value in seconds</td><td>The amount of battery runtime that must be available before the UPS or a Controlled Outlet Group will turn on after a shutdown.</td></tr><tr><td>Load Shed On Battery</td><td>Disabled</td><td>• Enable
• Disable</td><td>When the unit switches to battery power, the UPS will disconnect power to the Controlled Outlet Group to save battery runtime.

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https://cdn.cnetcontent.com/9a/fa/9afa6d3e-3373-4a78-a073-0f7d274ab6e4.pdf</td>
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<td>6. An apparatus according to claim 1 wherein said processor is further responsive to a signal indicative of a battery remaining charge for generating said battery remaining time indicative signal in accordance with each of said battery remaining charge indicative signal and said current drain.</td>
<td>The accused product according to claim 1 wherein said processor is further responsive to a signal indicative of a battery remaining charge (e.g., battery charge graph) for generating said battery remaining time indicative signal in accordance with each of said battery remaining charge indicative signal and said current drain

Option 3: Perform a Manual Runtime Calibration. This is a manual procedure and should not be confused with the runtime calibration performed through PowerChute software. The batteries inside of the Smart-UPS are controlled by a microprocessor within the UPS. Sometimes it is necessary to reset this microprocessor, especially after the installation of new batteries.
Note: Before beginning the calibration make sure the UPS has been online and charging for at leat 24 hours for just the UPS or 48 hours for a UPS with external batteries.

1. Stop the PowerChute software from running and disconnect the serial cable.
2. There must be at least a 30% load attached to the UPS during this procedure, and this load cannot fluctuate more than +/- 5%. This process will cause the UPS to shut off and cut power to its power outlets, therefore, attach a non-critical load to the UPS and then force the UPS on battery by disconnecting it from utility power.
3. Allow the unit to run on battery until it turns off completely. Make sure a 30% load or greater is present!
4. Plug the UPS back into the wall outlet and allow it to recharge (it will recharge more quickly turned off and with no load present). Once the unit has recharged, the ""runtime remaining"" calculation should be more accurate. Remember that if the unit is an older model, then the runtime will not improve significantly.

https://www.apc.com/us/en/faqs/FA156538/</td>
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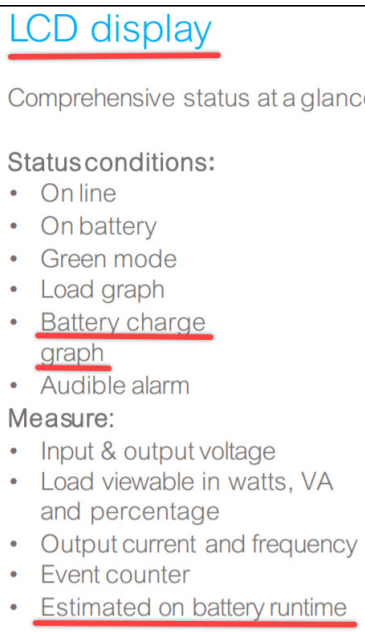
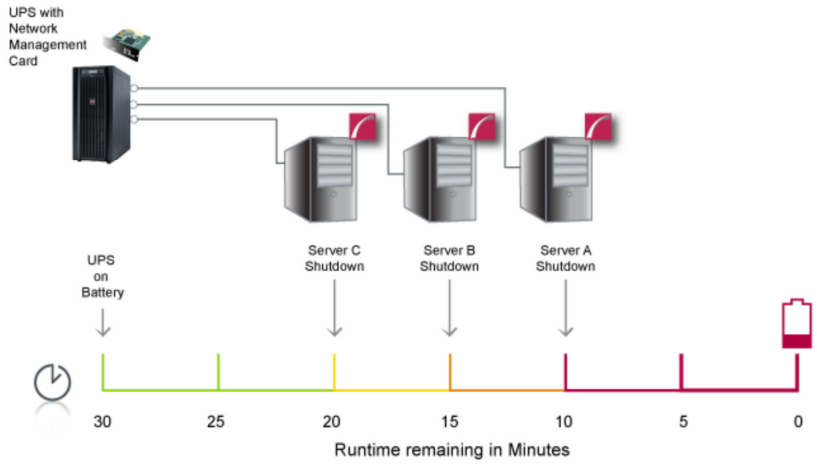
	 https://download.schneider-electric.com/files?p_File_Name=EcoStruxure+Ready+Smart-UPS+with+APC+SmartConnect+Brochure+Americas+V6.pdf&p_Doc_Ref=SPD_ABAR-AW6SSZ_EN&p_enDocType=Brochure
7. An apparatus according to claim 1 wherein said second load circuit is responsive to said battery remaining time indicative signal for disabling said second load circuit, during said battery backup operation, when said battery remaining time indicative signal is lower than a threshold	The accused product according to claim 1 wherein said second load circuit (e.g., circuit for providing energy to critical loads/devices of a main outlet group)is responsive to said battery remaining time indicative signal for disabling said second load circuit (e.g., shut down or turn off the devices of the main outlet group) during said battery backup operation, when said battery remaining time indicative signal is lower than a threshold associated with said second load circuit.

associated with said second load circuit.	**Sequenced Server Shutdown**
	
	The **Runtime Remaining below Threshold** event can be used to sequence the order that your servers shut down during an extended power outage.
	
	This is useful if you have multiple servers powered by the same UPS and you want to extend the runtime for your higher priority servers. It also ensures that lower priority servers are the first to be shut down.
	
	This event will trigger a server shutdown command when the UPS is running on battery power and the runtime has dropped below the threshold configured. You can also configure a command file to execute before shutdown occurs by specifying a higher runtime threshold value for the **Run Command File** event action.
	
	Example
	
	1. You have 3 servers powered by the same UPS. Your lower priority server is Server C while you want to keep Server A running as long as possible.
	2. You want Server A to shut down when the UPS protecting it has 10 minutes runtime remaining.
	3. You want Server B to shut down when the UPS protecting it has 15 minutes runtime remaining.
	4. You want Server C to shut down when the UPS protecting it has 20 minutes runtime remaining.
	5. Configure each PowerChute Agent with the following threshold values:
	   - Server A – 10 minutes
	   - Server B - 15 minutes
	   - Server C - 20 minutes
	6. Each server is shut down when the runtime remaining drops below the threshold configured.
	
	 
	
	https://download.schneider-electric.com/files?p_enDocType=User+guide&p_File_Name=990-4595H-EN-Standard.pdf&p_Doc_Ref=SPD_PMAR-9E5LVY_EN

10. These allegations of infringement are preliminary and are therefore subject to change. For instance, there are other of Defendant's products that infringe.

11. Schneider has and continues to induce infringement. Schneider has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., battery systems and products/devices) such as to cause infringement of one or more of claims 1–12 of the '393 patent, literally or under the doctrine of equivalents. Moreover, Schneider has known of the '393 patent and the technology underlying it from at least the date of issuance of the patent or the date of the filing of this lawsuit.

12. Schneider has and continues to contributorily infringe. Schneider has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., battery systems and products/devices) such as to cause infringement of one or more of claims 1–8 of the '393 patent, literally or under the doctrine of equivalents. Moreover, Schneider has known of the '393 patent and the technology underlying it from at least the date of issuance of the patent or the date of the filing of this lawsuit.

13. Schneider has caused and will continue to cause Lamplight damage by direct and indirect infringement of (including inducing infringement of) the claims of the '393 patent.

IV. JURY DEMAND

Lamplight hereby requests a trial by jury on issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, Lamplight prays for relief as follows:

a. enter judgment that Defendant has infringed the claims of the '393 patent;

b. award Lamplight damages in an amount sufficient to compensate it for Defendant's infringement of the '393 patent in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;

c. award Lamplight an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;

d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award Lamplight its attorneys' fees, expenses, and costs incurred in this action;

e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;

f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and

g. award Lamplight such other and further relief as this Court deems just and proper.

DATED: November 30, 2021

Respectfully submitted,

RAMEY & SCHWALLER, LLP

/s/William P. Ramey, III
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